

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-against-

JOEL BELTRE,

Defendants.

NOTICE OF MOTION
11 Cr. 676 (RJS)

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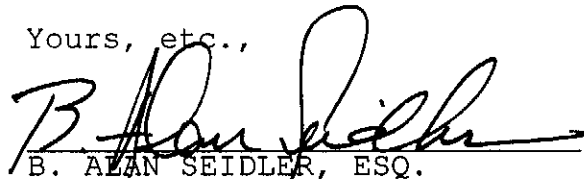
SIRS/MADAMES:

PLEASE TAKE NOTICE that upon the accompanying affidavit of the defendant BELTRE, sworn to the 30th day of March, 2012, and all the proceedings heretofore had herein, the defendant will move this Court before the Honorable District Judge Richard J. Sullivan, at the United State Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, on a date and time to be fixed by the Court, for an order:

1. Pursuant to Fed.R.Crim.P @ 11(d)(2)(B) withdrawing his guilty plea, and
2. Granting such other relief as is just.

Dated: New York, New York
March 30, 2012.

Yours, etc.,


B. ALAN SEIDLER, ESQ.
Attorney for Defendant
580 Broadway
New York, New York 10012
212-334-3131

To: CLERK OF THE COURT, ECF
CHAMBERS HON. RICHARD J. SULLIVAN
United States District Judge
Joel Beltre